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March 12, 2021

VIA ELECTRONIC FILING

Honorable Loretta A. Preska
United States Courthouse
500 Pearl Street, Room 2220
New York, New York 10007

Re: *Bechler v. MVP Group International, Inc. et al.* - Case No. 16-cv-8837

Dear Judge Preska:

We represent MVP Group International, Inc. ("MVP"), Bed Bath & Beyond Inc. ("BBB"), and Wayfair LLC ("Wayfair") (collectively, the "MVP Defendants") in the above-referenced action. We also write on behalf of counsel for Defendant Jet.com ("Jet") (collectively, with the MVP Defendants, "Defendants"), and with the consent of counsel for Plaintiff Shane Bechler.

In Your Honor's Memorandum and Order dated March 5, 2021, Your Honor granted Defendants' motion for summary judgment and held that "Defendants are entitled to their costs and fees incurred after September 2, 2018, and Plaintiff and the Liebowitz Law Firm shall be jointly and severally liable for those costs and fees." Dkt. No. 63 at 19. Your Honor directed the parties to "confer with an eye towards resolving the matter of the amount of costs and attorney's fees." *Id.* at 20. In the absence of an agreed-up resolution, Your Honor directed the parties to propose a schedule by letter for the Court to resolve the matter. *Id.*

The parties' counsel have conferred in an effort to resolve the matter of the amount of costs and attorney's fees, but, to date, have been unsuccessful in those efforts. As such, the parties respectfully propose the following schedule for briefing of this matter: (i) Defendants' initial submission(s) to be due on or before Friday, April 2, 2021; (ii) Plaintiff's responsive submission(s) to be due on or before Friday, April 23, 2021; and (iii) Defendants' reply submission(s), if any, to be due on or before Friday, May 7, 2021.

The parties will continue to confer in good faith in an effort to resolve this matter. Thank you for your consideration of this matter.

Respectfully,
BOND, SCHOENECK & KING, PLLC
/s/ George R. McGuire
George R. McGuire
cc: Counsel of Record (via ECF)

So ordered
Loretta A. Preska
3/15/21